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October 4, 2005

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT, E.D.N.Y.  
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REPLY TO: NJ

★ OCT 13 2005 ★

- Via Facsimile & First Class Mail -  
Honorable Joan M. Azrack  
United States Magistrate Judge  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

BROOKLYN OFFICE

Re: General Motors Acceptance Corp. V. McNamara et als  
US Dist. Ct., EDNY Case No. CV 96-3919 (ERIC)

Dear Judge Azrack:

I write to update the court and counsel concerning our representation of Kimberly and Della Lynn McNamara in the above referenced matter. We have been, finally, contacted by Mrs. McNamara and are now authorized to appear for her and her daughter in the action.

Because there is no one at this firm who had any contact with the case in the 1990s, we respectfully request at least 30 days to get acquainted with the facts and status of the case. I have this day made a request to the attorney for plaintiff to review the documents in the case. It is my understanding that there are motions which are in preparation among the parties. To the extent that any of said motions involve our clients, I respectfully request that we be granted an extension of 30 days in which to respond to such motions. Moreover, I respectfully request that we be granted an extension of time in which to move for summary judgment should our review of the matter so dictate.

Thank you for your consideration with regard to this request.

Respectfully submitted,

George F. Mackay (35086M)

cc: Kenneth Cooperstein, Esq.  
Daniel Wallen, Esq.

MOVANT'S COUNSEL IS DIRECTED  
TO SERVE A COPY OF THIS ORDER  
ON ALL PARTIES UPON RECEIPT

App. granted

s/Joan M. Azrack